

EXHIBIT A

Deposition of Steven R. Verduyn, 4/6/2005

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MASSACHUSETTS

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4 CYCLE-CRAFT CO., INC., d/b/a
5 BOSTON HARLEY-DAVIDSON/BUELL,

6 Plaintiff,

7 vs. Civil Action No. 04 11402 NMG

8 HARLEY-DAVIDSON MOTOR COMPANY, INC.
9 and BUELL DISTRIBUTION COMPANY, LLC,

10 Defendants.
11 -----

12 Video Deposition of STEVEN R. VERDUYN

13 Wednesday, April 6th, 2005

14 10:09 a.m.

15 at

16 GRAMANN REPORTING, LTD.
17 710 North Plankinton Avenue, Suite 710
18 Milwaukee, Wisconsin

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20 Reported by Sarah A. Reinicke, RPR/RMR/CRR
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Q How many times have you commenced an investigation
based on evidence of a large volume of sales towards
the end of the model year?

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A I don't have an exact number, but that is a trend
that I do see with some regularity in the ones that I
have investigated in the past. It's a telltale
potential sign. And that in and of itself, the fact
that there are a large number of sales in July,
doesn't automatically mean that there's a problem.

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1 But when we've got other issues or information that's
2 come to our attention on a particular dealership,
3 it's another reason to believe that an audit's
4 probably the way to proceed.

5 Q And by audit, do you mean an investigation? Or, I
6 mean, are you using the term "audit" to include an
7 investigation as opposed to the formal on-site audit
8 at the dealership?

9 A Let me clarify. An audit would be a review of the
10 records prior to making a determination of a course
11 of action.

12 Q Would a large volume of sales towards the end of the
13 model year without anything else cause you to begin
14 an investigation? In other words, when I say without
15 anything else, without other reasons to suspect
16 nonretail sales?

17 A No, not that I can think of.

18 Q Can you think of any other reasons or any other
19 events that would lead you to begin an investigation
20 of a dealership for potential violations?

21 A Yes.

22 Q What?

23 A A number of sales that show that particular vehicle
24 as being resold for a second time in a very short
25 duration.